

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT  
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Dawan K. Ingram

(Enter above the full name of the plaintiff in this action)

**AMENDED**  
COMPLAINT

V.

Civil Action No. 3:21-cv-17399-MAS-

(To be supplied by the Clerk of the Court)

New Jersey state prison Employees

Omar Mendoza, Craig Sears,

Officer Young, John Doe-1-50-

(Enter the full name of the defendant or defendants in this action)

IN their individual and  
official capacity

INSTRUCTIONS; READ CAREFULLY.

1. This complaint must be legibly handwritten or typewritten, signed by the plaintiff and subscribed to under penalty of perjury as being true and correct. All questions must be answered concisely in the proper space on the form. Where more space is needed to answer any question, attach a separate sheet.
2. In accordance with Rule 8 of the Federal Rules of Civil Procedure, the complaint should contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, (2) a short plain statement of the claim showing that you are entitled to relief, and (3) a demand for judgment for the relief which you seek.
3. You must provide the full name of each defendant or defendants and where they can be found.
4. You must send the original and one copy of the complaint to the Clerk of the District Court. You must also send one additional copy of the complaint for each defendant to the Clerk. Do not send the complaint directly to the defendants.
5. Upon receipt of a fee of \$400.00 (a filing fee of \$350.00, and an administrative fee of \$50.00), your complaint will be filed. You will be responsible for service of a separate summons and copy of the complaint on each defendant. See Rule 4, Federal Rule of Civil Procedure.

6. If you cannot prepay the \$400.00 fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth in the application to proceed in forma pauperis. See 28 U.S.C. §1915. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

7. If you are given permission to proceed in forma pauperis, the \$50.00 Administrative Fee will not be assessed. The Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

#### QUESTIONS TO BE ANSWERED

1a. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. §1983 (applies to state prisoners)

☐ Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

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1b. Indicate whether you are a prisoner or other confined person as follows:

☐ Pretrial detainee

☐ Civilly-committed detainee

☐ Immigration detainee

☒ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

☐ Other: (please explain) \_\_\_\_\_

## 2. Previously Dismissed Federal Civil Actions or Appeals

If you are proceeding in forma pauperis, list each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility, that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted. Please note that a prisoner who has on three or more prior occasions, while detained in any facility, brought an action or appeal in a federal court that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted, will be denied in forma pauperis status unless that prisoner is under imminent danger of serious physical injury. See 28 U.S.C. § 1915(g).

## a. Parties to previous lawsuit:

Plaintiff(s):

Defendant(s):

*NA*

## b. Court and docket number: \_\_\_\_\_

## c. Grounds for dismissal: ( ) frivolous ( ) malicious

( ) failure to state a claim upon which relief may be granted

## d. Approximate date of filing lawsuit: \_\_\_\_\_

## e. Approximate date of disposition: \_\_\_\_\_

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on separate sheets.

3. Place of Present Confinement? New Jersey state prison

## 4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional Plaintiffs, if any.)

## a. Name of plaintiff:

Dawan Ingram



Address: N.J.S.P - P.O. Box 861, Trenton, NJ 08625  
Inmate #: 1052709

b. First defendant:

Name: Officer Young  
Official position: Correction officer  
Place of employment: New Jersey State Prison  
How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

censored constitutionally protected expression  
(prisoners personal mail) in violation of the  
1st Amendment and 14th Amendment - Did  
not follow due process

c. Second defendant:

Name: Omar Mendoza  
Official position: Mail Room Supervisor  
Place of employment: New Jersey State Prison  
How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

permitted the censoring of constitutionally  
protected expression (prisoners personal mail)  
in violation of the 1st Amendment and  
14th Amendment. Did not follow due process  
to reduce recidivism

a pamphlet  
to rehabilitate  
prisoners by  
building credit  
from prisoners

d. If there are more than two defendants, attach a separate sheet. For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

rd. Defendant:

NAME: Craig Sears

Official position: Correction officer Supervisor

Place of Employment: New Jersey state prison

permitted the censoring of constitutionally  
protected expression (prisoners personal mail) in  
violation of the 1<sup>st</sup> Amendment and 14<sup>th</sup>  
Amendment.

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

☒ Yes ☐ No

If your answer is "Yes," briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

I electronically wrote inquiries to the N.J.S.P  
mail room, I also wrote grievances to  
New Jersey State Prison Administration as well as  
central office

If your answer is "No," briefly explain why administrative remedies were not exhausted.

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6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet if necessary.)

p mailroom • on 12-15-2016 a book that I authored and had published  
was censored and returned to the source of sale solely  
because I was the author.

s.p mailroom • on 4-28-2016 "officer young" censored personal  
mail which was a pamphlet designed to help  
prisoners rehabilitate themselves by building credit



from prison to prevent recidivism. This book was free for prisoners however I had to pay \$29.99 in shipping and handling which I did. A institutional check was mailed to Ortiz publishing group on 4-15-21.

S.P mailroom - on 7-5-21 John Doe confiscated the face of incoming personal mail preventing me from knowing who wrote me and also preventing me from responding.

S.S.P  
ronic  
ail - on 7-21-21 Omar Mendoza permitted the censoring of personal mail by justifying the confiscation because "it did not come from source of sale". After I wrote a grievance on 7-9-21 complaining.

J.S.P  
ronic  
ail - 7-22-21 - Craig Sears permitted the censoring of personal mail by also justifying the confiscations as being "over the weight limit" After I wrote a grievance to administration complaining.

J.S.P  
ronic  
mail - on 7-7-21 Jeffrey Crothers ordered me to put in a property claim form. 8-20-21 publication was under review and then ~~de~~ censored for inadequate reasons. My money was not returned

S.S.P  
~~ronic~~  
+ 1-R - 6-25-21 Blank Confiscation papers were sent to me 2 months later omitting who and why my personal mail was censored and confiscated by.

## 7. Relief

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

- grant injunctive ~~relief~~ relief and order N.J.S.P to change ~~mailroom~~ mailroom policies that don't comply with the U.S Constitution, and to stop practices that also don't comply with the U.S Constitution and the U.S Administrative Code ~~with~~ with personal mail

- grant the plaintiff Damages in the amount of \$50,000
- or in the alternative award nominal damages
- grant a declaratory Judgement
- grant punitive Damages

8. Do you request a jury or non-jury trial? (Check only one)

☒ Jury Trial ( ) Non-Jury Trial

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 18 day of December, 2021

Rawan Singhani

Signature of plaintiff\*

(\*EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF. REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT).



U.S.S.p Mail Room

1-21 Omar Mendoza retaliated by completely denying an incentive food package when prison administration permitted me to order \$30.00 instead of the maximum.

on 8-7-2021- I wrote an inquiry to Administration for them to correct Mendoza's ill willed acts and Mendoza intercepted my grievance to hinder me from ordering this food package like every other prisoner was allowed to.